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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

MOHAMED FARAJ,  
Petitioner/Movant,

vs.

JAMES C. HOWARTH,  
Respondent.

CASE NO. 13-CR-20564-1

PETITIONER'S MOTION TO  
COMPEL TRIAL COUNSEL

F I L E D  
OCT 16 2017  
CLERK'S OFFICE  
DETROIT

(1) COMES NOW Mohamed Faraj, Pro-se and moves this Honorable Court for a Motion To Compel Trial Counsel for the reasons set herein below:

(2) Petitioner Mohamed Faraj's Court Appointed Counsel James C. Howarth, from the Law Offices of James C. Howarth, located at 820 Ford Building, 615 Griswold, Detroit, Michigan, to represent him in the above stated Case No. 13-CR-20564-1, and upon Direct Appeal United States of America v. Mohamed Faraj, 6th Circuit Case No. 15-1761.

(3) At the beginning of trial up and to Appeal in this case the above Counsel has refused to provide to Mr. Faraj, any and all discovery material, and further has failed to provide Mr. Faraj, with any responses from the Government relating to his Appeal in this matter. Mr. Faraj, has made many attempts by letter and phone to request such material. Counsel Howarth, refuses to respond or send Mr. Faraj any of his requested materials or responses to his Appeal from the Government.

ARGUMENT

(4) Petitioner Faraj's Appeal had become final on July 3rd 2017, and upon this completion Mr. Faraj filed with the United States Supreme Court his Petition for Writ of Certiorari.

(5) Mr. Faraj plans to file his Pro-se Motion pursuant to 28 U.S.C. §2255 for arguments that were unavailable or withheld from his Trial Counsel as well as other claims.

REQUESTED DOCUMENTATION

(6) Mr. Faraj ask's this Honorable Court to Compel his Trial Counsel for the below documents:

Any and all Pre-Trial Discovery Material relating to his case, and any Material Evidence and Documents, tangible and non-tangible, and all evidence the United States intended to use during trial, Witness and Informant Statements, Scientific Reports, and all Pre-trial Motions and Documents, Police Reports, Affidavits, Search Warrants, Survielance Photos.

(7) Mr. Faraj, further asks this Honorable Court for Court Appointed Counsel to relenquish the "Trial Transcripts" and "Sentencing Transcripts" for the above Trial in this matter as part of the first requested documents listed above with paragraph (6).

PROBATIVE VALUE OF MATERIAL REQUESTED

(7) The material evidence of documents will either contradict or to corroborate Mr. Faraj's claims agaisnt the United States and prove his innocence to the charges against him, and will produce facts that will exculpate him if fully developed at an

evidentiary hearing for his Motion §2255 proceeding.

This material evidence or documents are necessary for evidentiary purposes in somuch he has a right to prove his innocence upon the record, he is entitled to this relief.

CONCLUSION AND PRAYER

(8) WHEREFORE, Mr. Faraj has demonstrated his entitlement to relief sought herein his request to compel appointed Counsel to turn over all material and documents that are in aid of his Motion pursuant to 28 U.S.C. §2255, and prays this Honorable Court will compel Counsel and any other relief it deems just and proper.

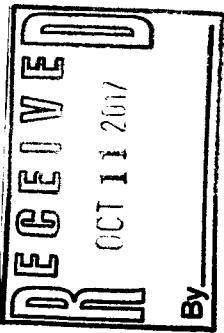
Respectfully and faithfully Submitted,

 10-02-17

Mr. Mohamed Faraj, #48851-039  
Pro-se Petitioner  
USP - Terre Haute  
P.O. Box 33  
Terre Haute, Indiana 47808-0033

Mr. Michael Faraj, C-4651-039  
U.S. Terre Haute  
P.O. Box 33  
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FEDERAL CORRECTIONAL COMPLEX  
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DETROIT, MI. 48226  
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